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as General Guardians of Kelsy Arlitz

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELSY ARLITZ, individually; GARY
ARLITZ, as general guardian of ward
KELSY ARLITZ; KARIE ARLITZ, as
general guardian of ward KELSY ARLITZ,

Plaintiffs

vs.

GEICO CASUALTY COMPANY; DOES 1
through 100 and ROE CORPORATIONS 1
through 100, inclusive,

Defendants

Case No.: 2:19-cv-00743-CDS-~~RFB~~-DJA¹

**STIPULATION AND ORDER TO
EXTEND THE BRIEFING
SCHEDULE FOR DEFENDANT
GEICO CASUALTY COMPANY'S
PARTIAL MOTION FOR
RECONSIDERATION OF THIS
COURT'S ORDER DENYING
GEICO'S MOTION FOR
SUMMARY JUDGMENT ON
PLAINTIFFS' BREACH OF
CONTRACT CLAIMS (ECF No.
190)**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs KELSY
ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSY ARLITZ,
and KARIE ARLITZ, as general guardian of ward KELSY ARLITZ ("Plaintiffs"),

¹ Document does not comply with ECF No. 158. All documents must bear the correct case number
2:19-cv-00743-CDS-DJA. Counsel is advised to correct the case number before filing any future documents.



1 through their counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW
 2 GROUP and Farhan R. Naqvi and Elizabeth E. Coats of NAQVI INJURY LAW, and
 3 Defendant GEICO CASUALTY COMPANY (“GEICO”), through its counsel of record,
 4 James P. Wagoner and Jonathan W. Carlson of McCORMICK, BARSTOW, SHEPPARD,
 5 WAYTE & CARRUTH LLP and Cary B. Lerman and Jacob Max Rosen of MUNGER
 6 TOLLES & OLSON, LLP, that the deadline for Plaintiffs to file their Response to
 7 GEICO’s Partial Motion for Reconsideration of this Court’s Order Denying GEICO’s
 8 Motion for Summary Judgment on Plaintiffs’ Breach of Contract Claims (ECF No. 190)
 9 shall be extended by fourteen (14) days, from Tuesday, January 3, 2023 to Tuesday,
 10 January 17, 2023.

11 IT IS FURTHER STIPULATED AND AGREED that the deadline for GEICO to
 12 file its Reply in Support of its Partial Motion for Reconsideration of this Court’s Order
 13 Denying GEICO’s Motion for Summary Judgment on Plaintiffs’ Breach of Contract
 14 Claims (ECF No. 190) shall be extended by twenty-eight (28) days from Tuesday,
 15 January 17, 2023, the date Plaintiffs file their Response. Therefore, GEICO’s deadline
 16 to file its Reply shall be Tuesday, February 14, 2023.

17 GEICO filed its Partial Motion for Reconsideration on December 20, 2022. This is
 18 the parties’ first request for extension of time. This Stipulation and [Proposed] Order is
 19 submitted in accordance with LR IA 6-1.

20 The parties respectfully request this brief extension of the briefing schedule to
 21 accommodate Plaintiffs’ counsel. From Monday, December 12, 2022 through Thursday,
 22 December 22, 2022, Plaintiffs’ counsel, Mr. Prince, conducted a trial in the matter of
 23 *Crick v. In-n-Out Burgers, et al.*, Eighth Judicial District Court Case No. A-18-781174-
 24 C. Plaintiffs’ counsel devoted substantial resources during those nearly two weeks to
 25 conduct that trial. In addition, Plaintiffs’ undersigned counsel, Mr. Strong, is traveling
 26 over the holidays on a pre-planned family vacation and will not be returning to the office
 27 until Tuesday, January 4, 2023, the date after the current deadline to file Plaintiffs’
 28 Response to GEICO’s Partial Motion for Reconsideration. As a result, GEICO has
 graciously agreed to extend the briefing schedule to accommodate Plaintiffs’ counsel.

...

Based on the foregoing, the parties respectfully request this Court to approve the foregoing stipulation. The parties' requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 27th day of December, 2022.

DATED this 27th day of December, 2022.

PRINCE LAW GROUP

**McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP**

/s/ Kevin T. Strong

/s/ Jonathan W. Carlson

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: December 28, 2022